

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO.: 1:23-cv-20341-RNS

MAX'IS CREATIONS INC.,

Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS,
AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE "A",

Defendant.

MOTION FOR ENTRY OF CLERK'S DEFAULT

Plaintiff MAX'IS CREATIONS INC. ("MCINC" or "Plaintiff"), by and through its undersigned counsel, hereby requests that the Clerk enter default in this matter against the Defendants identified on Schedule "A" to the Complaint as numbered 3 to 8, 12, 13, 15, 16, 19, 20, 23 to 27, 29 to 45, 47 to 57, 59 to 66, 68, 70 to 85, 87 to 116, 118 to 120, 122, 123, 125 to 136, 138, 144, 152, and 156 to 189 ("Defaulting Defendants") hereto on the ground that Defendants have failed to appear or otherwise respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure.

1. The Declaration of ANGELA M. NIEVES in Support of Motion for Entry of Clerk's Default ("Nieves Decl.") filed concurrently herewith demonstrates that the Defendants were served with the Summons and a copy of the Complaint by email communication in compliance with the Court's Order on Alternative Service (ECF No. 11):

- a. Defendants numbered 126 to 136 and 161 to 189 were served on February 14, 2023 (ECF No. 26).
- b. Defendants numbered 53 to 123 were served on February 16, 2023 (ECF No. 31).
- c. Defendants numbered 124, 125 and 137 to 160 were served on February 17, 2023 (ECF No. 32).
- d. Defendants numbered 1 and 21 were served on February 24, 2023 (ECF No. 33).
- e. Defendants numbered 29 to 52 were served on February 28, 2023 (ECF No. 34).
- f. Defendants numbered 2 to 20 and 22 to 28 were served on March 3, 2023 (ECF No. 38).

2. The time allowed for Defaulting Defendants to respond to the Complaint has expired. The Court has not granted Defaulting Defendants an extension of time to respond to the Complaint. Defaulting Defendants have failed to answer or otherwise respond to the Complaint, or serve a copy of any Answer or other response upon Plaintiff's attorney of record.

3. Plaintiff is informed and believes that Defaulting Defendants are not considered infants or incompetent persons. Plaintiff is informed and believes that the Servicemembers Civil Relief Act does not apply.

4. Pursuant to the Court's instruction, Plaintiff sent notice of the Court's Order entered at ECF No. 61 to the Defaulting Defendants on June 29, 2023. (ECF No. 63).

WHEREFORE, Plaintiff MAX'IS CREATIONS INC. requests that a default be entered by the Clerk against Defendant The Individuals, Partnerships, and Unincorporated Associations Identified on Schedule "A" numbered 3 to 8, 12, 13, 15, 16, 19, 20, 23 to 27, 29 to 45, 47 to 57, 59 to 66, 68, 70 to 85, 87 to 116, 118 to 120, 122, 123, 125 to 136, 138, 144, 152, and 156 to 189, and for such other and further relief as to the Court deems just and proper in the premises.

Dated: June 30, 2023

Respectfully submitted,

/s/Angela M. Nieves

ANGELA M. NIEVES

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Counsel for Plaintiff Max's Creations Inc.

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on June 30, 2023, the foregoing Motion was emailed to the Defendants identified on Schedule "A" to the Complaint as numbered 3 to 8, 12, 13, 15, 16, 19, 20, 23 to 27, 29 to 45, 47 to 57, 59 to 66, 68, 70 to 85, 87 to 116, 118 to 120, 122, 123, 125 to 136, 138, 144, 152, and 156 to 189 by emailing these defendants the Motion to the email addresses listed below on the Service List.

/s/ Angela M. Nieves
ANGELA M. NIEVES

SERVICE LIST

Doe #	Merchant Name	Email Address
3	Shenzhen Shenglong International Trade Co., Ltd.	leo@hkshenglong.com
4	Xiamen Saiko Trade Co., Ltd.	stella@ikitobi.cn
5	Shanghai SIRF Industrial Co., Ltd.	tony_huang@f-colour.com
6	Shanghai SIRF Industrial Co., Ltd.	tony_huang2@yijian88.cn
7	Shenzhen Fanfan Fashion Trading Co., Ltd.	whfanfanshishang@163.com
8	Shanghai Fine-V Ceramic Gift Intl Trade Co., Ltd.	jane@fine-v.com
12	Hangzhou Yuanji Gift Co., Ltd.	initibag03@163.com
13	Jinan Wuhai Trading Co., Ltd.	120334615@qq.com
15	Yiwu Qingju Trading Co., Ltd.	qingjutrading@aliyun.com
16	Henan Qumiao Network Technology Co., Ltd.	qumiao@wercome.com
19	Fuzhou Sheng Leaf Import And Export Co., Ltd.	sales@shengleaf.com
20	Shenzhen Tongfuda Electronic Commerce Co., Ltd.	liumin@gouzoon.com
23	Xiamen Hongyu Intelligent Technology Co., Ltd.	shanz34509@163.com
24	Xiamen Kunbo Industry & Trade Co., Ltd.	c410411197@qq.com
25	Xiamen Yisheng Economics & Trade Co., Ltd.	477576484@qq.com
26	Dongguan Yong Rui Bianse Technology Co., Ltd.	yongruibiansebei@hotmail.com
27	Luoyang Wangchuang Electronic Commerce Co., Ltd.	zhc15716667557@sina.com

29	PFDIYF Official Store	18248586379@163.com
30	Shop5481158 Store	teywi264@126.com
31	Daily necessities home store Store	li1324198874@163.com
32	Mug Factory Flagship Store	zengyuerong920507@163.com
33	MoMo Live Store	13332955148@139.com
34	HAEJU HOME Store	haizhou_ae@163.com
35	Shop1100316109 Store	wangnf7588@aliyun.com
36	AB MART Store	tony_huang3@yijian88.cn
37	RDOOUH Store	m15267960270@163.com
38	Shop4691125 Store	babyman2021@sina.com
39	Ceasar's Tool Store	tony_huang1@f-colour.com
40	i House Store	yijiaqingjie@hotmail.com
41	Dser-Home Store	1137675980@qq.com
42	12 clock Store	shutaishu005@163.com
43	Watermelon's Store	364119404@qq.com
44	Shop911606587 Store	sumaitong2021001@163.com
45	Saccura Store	storeofbee@gmail.com
47	shenghuoguan Store	1768632509@qq.com
48	guanchi2 Store	guanchi20211104@163.com
49	blue-jing Store	282116599@qq.com
50	666Mug Store	mengmengzi002@163.com
51	Ceramic Pro Store	lengwenying8680@gmail.com
52	With Hopeing Store	Huangweizheng2022@163.com
53	R.W. GAGE TRADING LTD.	rwgagetradingltd@gmail.com
54	Miswagi Distribution Inc	ranaomar71.ra@gmail.com
55	MuEn SHOP	18736004417@163.com
56	zhengzhoufeiliangshangmaoyouxiangongsi	1442336889@qq.com
57	Wuhanjingkaishengdianzishangwuyouxiangongsi	huijingyao1989@163.com
59	XLDMDMDM	bxlmndm8886@163.com
60	Negoshanty	haematology0330@aol.com
61	xishihui shop	songcunleius@163.com
62	let me pass	wentinghelpus@sina.com
63	Kimliastore	674159255@qq.com
64	Dimida	desi.andre83@gmail.com
65	SZWQBH	lwd26413909@163.com
66	FENGZH	xklzncvk6546899462@163.com
68	huanyugongsi	w17650504243@163.com
70	Mansa Resales	mansaresales@gmail.com
71	MinNing	w17807829507@163.com

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80	hua mei xing heng	linmahua02@163.com
81	Fumao Trading	yamaxundyc@163.com
82	LoveD	1557529763@qq.com
83	JDKKYPT	liqiang0091@163.com
84	feiyuebaihuoshanghang	chenjiezgs@163.com
85	Online Amazing Store	my.unique.store@hotmail.com
87	YE61043	wangy46546us@163.com
88	Trading-World	josephpekarski@gmail.com
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91	Le Miqu	zyp15803426702@163.com
92	ZoZo store	shenyichuangkeji@163.com
93	TongShiQi	yinjiaxin0521@163.com
94	xiangchengshirunruishangmao	wuxun7888@163.com
95	I.C.K Deals	kaleementerpriseltd@gmail.com
96	JXinT	bm18666023227@163.com
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98	GhjUS	guohaijun1688@hotmail.com
99	ZIYUMR	1780446209@qq.com
100	konggeriyongbaihuodian	luoyuting0918@outlook.com
101	WBYSO	wbyshangmaous@163.com
102	YINGFENGWL	yinfengwl33505@163.com
103	Coles E-Commerce	colesecommerce1@gmail.com
104	kunpengbaihuo	h845172642@163.com
105	huairenshilanjiaojiarendianzishangwuyouxiangongsi	cxx15935491182@outlook.com
106	weiweifafa	q2025553492@163.com
107	jinzengshangmaoyouxiangongsi	zxmbbcc@163.com
108	little tiger's store	rachelli567@163.com
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110	LQJQQD	lrj0925uk@163.com
111	zhongyuwangluo	zhongyuwangluoji@163.com

112	XINYIRONGXIAN	zgf_2019@163.com
113	Huibi	huibius@163.com
114	lanhongshangmao(xingjun12)	w458668574@163.com
115	wuzhongdian	wuzhongdian789@163.com
116	STSC Market	stscmarket@gmail.com
118	YSBHS	wuyaopeng19780721@163.com
119	HuangJiShangMao	sdfasdfghffdgghrsty@outlook.com
120	AuraroGeneralStore	15834078985@163.com
122	XSDbeimei	sqq0328us@126.com
123	xiaowanzi Lcc	qyf569186342@163.com
125	teerifle	chiplaptop.02@gmail.com phuochait4@gmail.com voyeu123pro@gmail.com
126	Copy03	m13229945243@163.com
127	flymachine	nihaohahaha1@sina.com
128	homedod	qleo9e9e@yeah.net
129	movesports	m18159891392@163.com
130	Likenices	m16561112412@163.com
131	Baguoo	m16560314348@163.com
132	kxingshop	m16560314348@163.com
133	Thisisfashion	m16561184757@163.com
134	profoundadvised	gugezhuanmai@126.com
135	starrynight0108	cathy@xdrcollection.com
136	christmascupgifts	gfyjhkgehu021@163.com
138	MIMIVintageGifts	vansondhbk@gmail.com
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